

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES

v.

EMADEDIN MUNTASSER


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Cr. No. 05-1657-CBS

GOVERNMENT'S MOTION TO SEAL COMPLAINT

Now comes the United States of America, by its attorneys, Michael J. Sullivan, United States Attorney, and Michael D. Ricciuti and B. Stephanie Siegmann, Assistant U.S. Attorneys, and hereby moves to seal the complaint, the supporting affidavit, and all other filings in this matter until further Order of this Court.

As grounds for the within motion, the government states that it is not seeking an arrest warrant in this matter nor intends to arrest Muntasser on the complaint in this case at this time, and that sealing this complaint thus is in the interests of justice. Moreover, as is reflected in the complaint, this case arises from a long-term FBI anti-terrorism investigation which implicates Muntasser and potentially implicates other defendants (both identified and not in the complaint affidavit) in the alleged scheme pursuant to 18 U.S.C. §1001(a)(1) as well as other and potentially more serious crimes arising from these facts. The government (the U.S. Attorney's Office and affected components of the Department of Justice in Washington) is actively considering those other charges and additional defendants, and thus seeks to

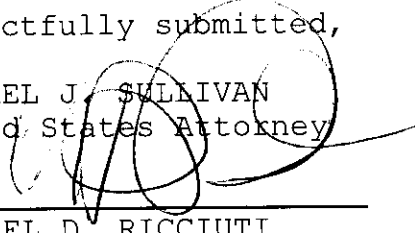
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allowed


seal the attached complaint to preserve the secrecy of the focus of this investigation and the fact that there are more potential defendants than just Muntasser until that review is completed.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:



MICHAEL D. RICCIUTI
B. STEPHANIE SIEGMANN
Assistant U.S. Attorney

Dated: April 6, 2005